

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

GEORGE MANDALA and CHARLES BARNETT,
individually and on behalf of all others similarly
situated,

Plaintiffs,

-against-

NTT DATA, INC.,

Defendant.

Civil Action No. 18 Civ. 6591 (CJS)

**DEFENDANT'S NOTICE OF CROSS-
MOTION TO STAY DISCOVERY**

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Attorneys for Plaintiffs

PLEASE TAKE NOTICE THAT, based upon the Declaration of Jessica F. Pizzutelli, Esq., dated May 10, 2019, and for the reasons set forth in Defendant's Memorandum of Law in Opposition to Plaintiffs' Motion to Compel and in support of NTT DATA, Inc.'s Cross-Motion to Stay Discovery, Defendant NTT DATA, Inc. ("Defendant"), by its attorneys, Littler Mendelson, P.C., will move this Court, at the United States Courthouse located at 100 State Street, Rochester, New York 14614, on a date and time to be set by the Court, for an order pursuant to Fed. R. Civ. P. 26 to stay all discovery, including to stay participation in the Fed. R. Civ. P. 26(f) conference, until the Court rules on Defendant's pending motion to dismiss the Complaint. Defendant intends to file and serve Reply papers.

Date: May 10, 2019
Fairport, New York

/s/ Jessica F. Pizzutelli

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